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Attorneys for CoEfficient, LLC, and
TelEfficient, LLC; aka TeleSwitch Finance, LLC
Alleged Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

In re:
COEFFICIENT, LLC,

Alleged Debtor.

Case No.: 4:18-bk-41932
Chapter 7

In re:
**TELEFFICIENT, LLC; aka TELESWITCH
FINANCE, LLC**

Alleged Debtor.

Case No. 4:18-bk-41933
Chapter 7

**DECLARATION OF TYLER J. BEXLEY
IN SUPPORT OF ALLEGED DEBTORS'
REPLY TO GENBAND'S OPPOSITION
TO MOTION TO DISMISS
INVOLUNTARY PETITIONS**

Hearing

Date: October 24, 2018
Time: 8:00 a.m.
Place: Courtroom 220
1300 Clay Street
Oakland, CA 94612

Pursuant to 28 U.S.C. § 1746, I, Tyler Bexley, hereby declare as follows:

1. I am counsel to CoEfficient, LLC and TelEfficient, LLC (collectively, the "Alleged Debtors") in the lawsuits identified herein and have personal knowledge of the facts contained in this

1 Declaration, which are true and correct, and if sworn as a witness, I could and would testify
2 competently thereto.

3 2. I submit this declaration as a supplement to my prior declaration in support of the
4 *Alleged Debtors' Motion to Dismiss Involuntary Petitions or, in the Alternative, Abstention, and*
5 *Reservation of Rights; Memorandum of Points & Authorities.*

6 3. I am lead counsel to the Alleged Debtors in (1) the state court action pending in the
7 116th Judicial District Court of Dallas County, Texas, entitled, *GENBAND Management Services,*
8 *Corporation v. CoEfficient, LLC and TelEfficient, LLC*, Cause No. DC-16-12593 (the "State Court
9 Action") and (2) the Adversary Proceeding that was initiated when Genband removed the State
10 Court Action to the U.S. Bankruptcy Court for the Northern District of Texas, pending as Adversary
11 Case No. 3:18-03242.

12 4. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts of the Deposition
13 of Mark Pugerude, taken in the State Court Action on June 29, 2018.

14 5. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts of the Deposition
15 of Dennis Murray, taken in the State Court Action on June 20, 2018.

16 6. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts of the Deposition
17 of Daryl Raiford, taken in the State Court Action on May 15, 2018.

18 7. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts of the Deposition
19 of Steven Bruny, taken in the State Court Action on May 17, 2018.

20 8. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts of the Deposition
21 of Hao Lam, taken in the State Court Action on May 11, 2018.

22 9. Attached hereto as **Exhibit 6** is a true and correct copy of a document produced in the
23 State Court Action and marked as Exhibit 52 to the Deposition of Steven Bruny.

24 10. Attached hereto as **Exhibit 7** is a true and correct copy of a document produced in the
25 State Court Action and marked as Exhibit 44 to the Deposition of Steven Bruny.

26 11. Attached hereto as **Exhibit 8** is a true and correct copy of a document produced in the
27 State Court Action and marked as Exhibit 16 to the Deposition of Daryl Raiford.
28

12. Attached hereto as **Exhibit 9** is a true and correct copy of correspondence between counsel in the State Court Action (with attorney-client privileged information redacted).

13. Attached hereto as **Exhibit 10** is a true and correct copy of the Alleged Debtors' Fourth Amended Disclosures in the State Court Action, setting forth the amount of damages the Alleged Debtors seek in the State Court Action.

I declare under the penalty of perjury that the statements included in this Declaration are true and correct.

Executed on this 17th day of October 2018.


Tyler J. Bexley